

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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(Admissions *pro hac vice* pending)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

LTL MANAGEMENT LLC,

Plaintiff,

v.

THOSE PARTIES LISTED ON APPENDIX A TO
COMPLAINT and JOHN AND JANE DOES 1-1000,

Defendants.

Adv. No. 23-01092 (MBK)

**SUPPLEMENTAL DECLARATION OF DANIEL J. MERRETT IN SUPPORT OF
DEBTOR'S COMPLAINT FOR INJUNCTIVE RELIEF AND RELATED MOTION**

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

I, Daniel J. Merrett, hereby declare under penalty of perjury:

1. I am a partner of the law firm of Jones Day, and my office is located at 1221 Peachtree Street, N.E., Suite 400, Atlanta, Georgia 30361. I am a member in good standing of the Bar of the State of Georgia. My application to appear *pro hac vice* in this case has been or soon will be filed with the Court in the main bankruptcy proceeding. There are no disciplinary proceedings pending against me.

2. I submit this supplemental declaration in connection with: (a) the *Debtor's Verified Complaint For Declaratory and Injunctive Relief (I) Declaring That the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions, and (III) Granting a Temporary Restraining Order Ex Parte Pending a Hearing On a Preliminary Injunction* and (b) the *Debtor's Motion for an Order (I) Declaring That the Automatic Stay Applies or Extends to Certain Actions Against Non-Debtors, (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Ex Parte Pending a Hearing on a Preliminary Injunction* (the "Motion")² filed contemporaneously herewith. I have personal knowledge of the matters set forth herein.

3. Attached hereto as **Exhibit 49** is a true and correct copy of an e-mail received April 4, 2023 from plaintiff's counsel in the Valadez Case to the Alameda County court and counsel to the Debtor and Johnson & Johnson, in which plaintiff's counsel confirms that "[t]he fraudulent transactions and conspiracy from [the Chapter 11 Case] will be at issue" in the Valadez Case.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

4. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: April 5, 2023

Respectfully submitted,

/s/ Daniel J. Merrett
Daniel J. Merrett